

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LOREM VASCULAR, Pte. Ltd., )  
a Singapore Company, )  
Plaintiff, ) C.A. No. 21-885-MN  
v. )  
PLUS THERAPEUTICS, INC., f/k/a CYTORI )  
THERAPEUTICS, INC., a Delaware Corporation; )  
and DOES 1 through 30, inclusive, )  
Defendants. )

**PLUS THERAPEUTICS, INC.'S MOTION TO DISMISS**

Defendant Plus Therapeutics, Inc. ("Defendant") hereby moves the Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss the Complaint asserted by Lorem Vascular, Pte. Ltd. The grounds for this motion are set forth in Defendant's opening brief, as well as Defendant's Request for Judicial Notice and the exhibits thereto.

OF COUNSEL:

John. T. Ryan  
David F. Kowalski  
Latham & Watkins LLP  
12670 High Bluff Drive  
San Diego, CA 92130  
(858) 523-5400  
Jake.Ryan@lw.com  
David.Kowalski@lw.com

Nicole Valco  
Latham & Watkins LLP  
505 Montgomery Street, Suite 200  
San Francisco, CA 94111  
(415) 391-0600  
Nicole.Valco@lw.com

*/s/ Kelly E. Farnan*  
Kelly E. Farnan (#4395)  
Dorronda R. Bordley (#6642)  
Richards, Layton & Finger, P.A.  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801  
(302) 651-7700  
farnan@rlf.com  
bordley@rlf.com

*Attorneys for Defendant Plus  
Therapeutics, Inc.*

Dated: August 12, 2021